

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING, LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Joint Administration Requested)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure, Gary D. Bressler, Esquire of and Michael R. Morano, Esquire (*pro hac vice* pending) of McElroy, Deutsch, Mulvaney & Carpenter, LLP, and Jeffrey S. Price, Esquire (*pro hac vice* pending), Melissa J. Lee, Esquire (*pro hac vice* pending), and Scott C. Williams (*pro hac vice* pending) of Manier Herod, P.C. appear for Philadelphia Indemnity Insurance Company, and, pursuant to Rules 2002(g), 2002(i), and 9007, request, unless otherwise directed by the Court, that all notices that are required to be given in this case or in any related adversary proceeding, and all papers that are required to be served in this case be given to and served upon the undersigned, at the offices, telephone and facsimile number set forth below:

<p style="text-align: center;">Gary D. Bressler, Esq. McElroy, Deutsch, Mulvaney & Carpenter, LLP 300 Delaware Avenue, Suite 1014 Wilmington, DE 19801 (T): (302) 300-4515; (F): (302) 654-4031 gbressler@mdmc-law.com</p>	<p style="text-align: center;">Michael R. Morano, Esq. (<i>pro hac vice</i> pending) McElroy, Deutsch, Mulvaney & Carpenter, LLP 1300 Mt. Kemble Avenue P.O. Box 2075 Morristown, NJ 07962 (T): (973) 993-8100; (F) (973) 425-0161 mmorano@mdmc-law.com</p>
<p style="text-align: center;">Jeffrey S. Price, Esq. (<i>pro hac vice</i> pending) Manier Herod, P.C. 1201 Demonbreun Street, Suite 900 Nashville, TN 37213 (T): (615) 742-9358; (F): (615) 242-4203 jprice@manierherod.com</p>	<p style="text-align: center;">Melissa J. Lee, Esq. (<i>pro hac vice</i> pending) Manier Herod, P.C. 1201 Demonbreun Street, Suite 900 Nashville, TN 37213 (T): (615) 742-9372; (F): (615) 242-4203 mlee@manierherod.com</p>

¹ The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent.

Scott C. Williams, Esq. (<i>pro hac vice</i> pending) Manier Herod, P.C. 1201 Demonbreun Street, Suite 900 Nashville, TN 37213 (T): (615) 742-9370; (F) (615) 242-4203 swilliams@manierherod.com	
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PLEASE TAKE FURTHER NOTICE that request is hereby also made for service of copies of all papers, including but not limited to reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements (or any drafts, thereof), and answering reply papers filed in the above-captioned case or any related adversary proceeding by mailing one copy of each, unless otherwise directed by the Court to the above address.

PLEASE TAKE FURTHER NOTICE that Philadelphia Indemnity Insurance Company does not intend this Notice of Appearance and Request for Notices and Service of Papers, nor any subsequent appearance, pleading, claim, or suit, to waive any rights to which it may be entitled including, but not limited to: (i) its right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) its right to trial by jury in any proceeding related to this case; (iii) its right to have the District Court withdraw the reference in any matter subsequent to mandatory or discretionary withdrawal; or (iv) any rights, claims, actions, defenses, setoffs, or recoupments to which it may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments it expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices and Service of Papers does not constitute an agreement to accept services of initial process under Rule 4, Fed. R. Civ. P., or Rule 7004, Fed. R. Bankr. P., nor shall it result in undersigned counsel being deemed to be the agent of Philadelphia Indemnity Insurance Company for such purpose.

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

Dated: November 18, 2022

/s/ Gary D. Bressler

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